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May, 27, 2008
Project No. 13636

Mr. J. Ryan Benefield, P.E.
Chief, Hazardous Waste Division
Arkansas Department of Environmental Quality
8001 National Drive
Little Rock, Arkansas 72219-8913

Subject: Facility Investigation (FI) Workplan Supplement
Perched and Alluvial Aquifer Monitoring Well Installation Program
Cedar Chemical Company Facility ("the Site")
West Helena, Arkansas
State EPA ID No. ARD990660649

Dear Mr. Benefield:

This Supplement is being submitted pursuant to Section 3.1 and 3.2 of the final Facility Investigation (FI) Workplan dated March 2008. Section 3.1 identified methods and proposed locations for perched zone monitoring wells. Section 3.2 discussed alluvial aquifer well locations, and stated that:

Additional wells will be installed in order to complete delineation of chemical impact in the alluvial aquifer, and to further characterize the hydraulic and geochemical nature of that aquifer. The locations and anticipated depths of alluvial aquifer wells will be based on the results of the CPT investigation and the January 2008 groundwater sampling event.

Both the CPT and the January 2008 groundwater sampling events, as well as a DPT investigation of the process areas, are now complete. This Supplement is intended to describe the objectives, locations, and construction of the planned perched and alluvial aquifer monitoring well system. Please note that this Supplement also modifies the proposed locations for perched zone wells provided in the Work Plan,

The objective of the perched aquifer monitoring well system is to enhance the understanding of the lateral and vertical extent and continuity of this Aquifer, and to monitor areas of the site where identified or known impacts or data gaps exist. After review of the data from the CPT, DPT and January 2008 groundwater sampling events, Geomatrix proposes to install additional perched zone monitoring wells at the locations shown on Figures 1 through 3.





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All perched aquifer wells will be 2-inch nominal diameter, and will be installed using rotasonic drilling methods, as described in Section 3.1 of the FI Work Plan, to a depth of approximately 20 to 25 feet below ground surface. The proposed well construction is presented in Figure 6 the FI Workplan.

The objective of the alluvial aquifer monitoring well installation is to enhance the understanding of groundwater flow, and the lateral and vertical extent of impact, in the alluvial aquifer, both on site and downgradient of the site. Because of the thickness of the alluvial aquifer, screened intervals for monitoring wells will be placed at multiple depths. This will allow Geomatrix to evaluate vertical gradients and the vertical movement of constituents of concern within the aquifer.

The proposed approach is to supplement existing alluvial wells by installing well clusters at key locations. Existing monitoring wells will be integrated into this well system, and their screen settings will not be duplicated by the new well clusters. To the extent practicable, the well cluster screen settings will target highly transmissive horizons, such as coarse sand or gravel beds, that may act as preferential migration pathways for dissolved contaminants. The objective of this approach will be to allow discrete sampling from either the upper, middle, and/or basal zones of the alluvial aquifer. Actual monitoring depths at each location will be selected in the field based on the site specific geology, but the approximate target depths for monitoring are 55, 85 and 145 feet below ground surface. Alluvial aquifer well locations, as well as anticipated completion depths, are shown on Figures 1 through 3.

Each 2-inch multi-level well will be installed using a Continuous Multilevel System technology (CMT Solinst) that allows screening multiple zones across the alluvial aquifer with a single borehole (typical well construction shown in Figure 4). This approach is widely used, represents a proven technology, and is recognized by both state environmental agencies and the U.S. Environmental Protection Agency as a technically sound approach. Discussions of this approach from the technical literature are included with this letter for your review. This mode of construction does vary from that described in the FI Workplan, but will still allow the collection of representative data that can be used in formulating a final remedy for the site.

After well installation is complete, each CMT well will be equipped with a dedicated downhole pump to be used for purging and sampling discrete horizons.

Subject to ADEQ approval of this approach, Geomatrix plans to mobilize to the Site to commence perched zone and alluvial aquifer well installation on approximately June 4th, 2008.



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If you have any comments regarding this report, please call me at (512) 494-0333.

Sincerely,
GEOMATRIX CONSULTANTS, INC.

A handwritten signature in blue ink that reads "Kelly Beck".

Kelly Beck, P.G.
Senior Project Manager

cc: Exxon Mobil Corporation
Helena Chemical Company

Attachments:

Figures 1 through 4
Multilevel Well Technology Supporting Literature

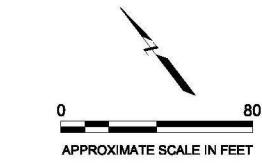
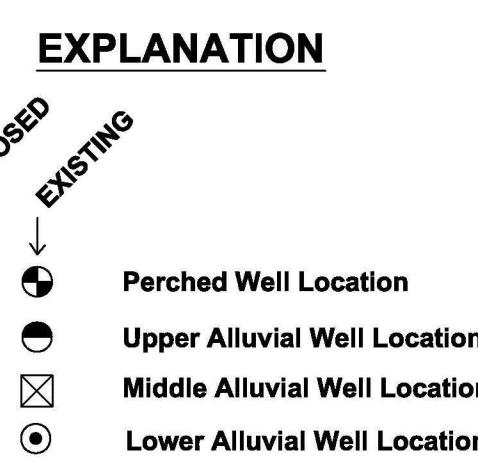


Screening Levels for Soil Samples		
Analyte	Residential Soil MSSL (0-6" bgs) (mg/kg)	DAF (6"-Groundwater) (mg/kg)
Aldrin	0.029	0.02
alpha-BHC	0.09	0.0003
beta-BHC	0.32	0.0001
Chlordane (technical)	1.6	0.5
Dieldrin	0.03	0.0002
Endrin	18	0.05
gamma-BHC (Lindane)	0.44	0.0005
Methoxychlor	310	8
Dinoseb	61	NA

Sample Result Exceeds Residential Soil (0-6") MSSL
Sample Result Exceeds Soil Dilution Attenuation Factor (DAF)
Sample Result Exceeds Both Soil MSSL and DAF

Analyte	Primary Drinking Water Standard (µg/L)	Region 6 TapWater MSSL (µg/L)
alpha-BHC	None	0.011
beta-BHC	None	0.037

Sample Result Exceeds the Primary Drinking Water Standard
Sample Result Exceeds the Tap Water MSSL
Sample Result Exceeds Both the Primary Drinking Water Standard and the Tap Water MSSL



GDPT-5+ DIRECT PUSH LOCATION

TW-1 TEMPORARY WELL LOCATION

SUSPECT WASTE BURIAL AREA IDENTIFIED BY ADEQ

DPT-2
DPT-18
DPT-39

Sample ID with Depth DPT-10 (0-4') 3/27/2008
1,2-Dichloroethane 0.4 mg/kg
Tetrachloroethene 2.1 mg/kg
Trichloroethene 0.0066 J mg/kg

Concentration of Analytes Detected above Screening Levels

ND - VOCs Not Detected above Screening Levels

NA - Sample Not Collected

TBP - To be Plugged and Abandoned

NOTE:
ALL ALLUVIAL WELLS WILL BE
INSTALLED USING ROTATIONAL
DRILLING TECHNIQUES IN A
SINGLE BOREHOLE.

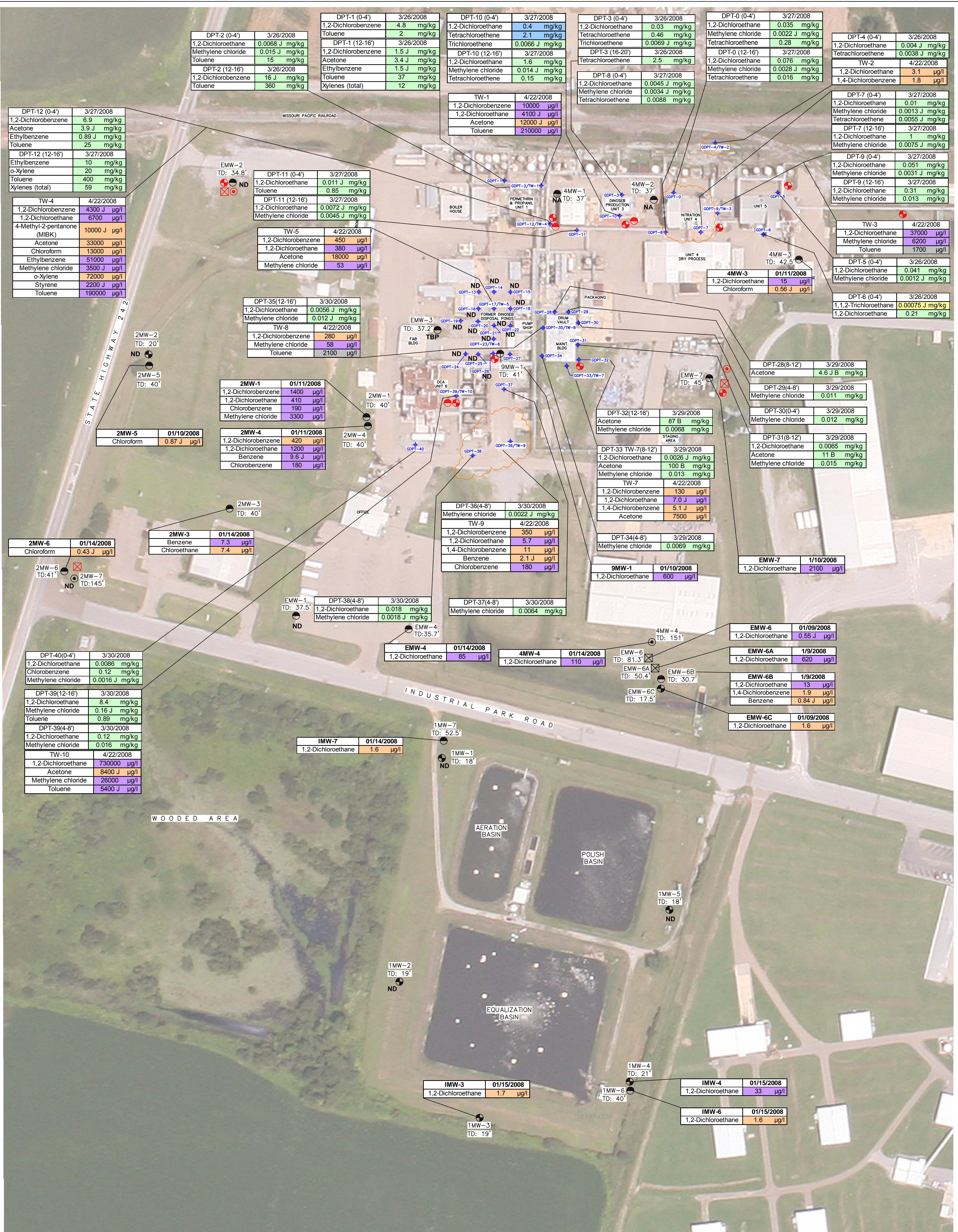
ALL PROPOSED WELL & BORING
LOCATIONS ARE APPROXIMATE,
& MAY BE ADJUSTED BASED ON
UTILITIES, FIELD ACCESS, &
OTHER CONDITIONS.

BASEMAP MODIFIED FROM:
EnvSafe, 1996-Phase III F, 2001 Groundwater Monitoring Report,
Drawings C2162GWS and C2162C7

Pesticides/Herbicides in Soil and Groundwater
and Proposed Perched and Alluvial Monitoring
Well Locations
DPT Investigation March 2008
Cedar Chemical
Helena-West Helena, Arkansas

By: MLS Date: 5/27/08 Project No. 13636

Geomatrix Figure 1



Screening Levels for Soil Samples		
Analyte	Residential Soil MSSL (0-6" bgs) (mg/kg)	DAF (6" to Groundwater) (mg/kg)
1,1,2-Trichloroethane	0.84	0.0009
1,2-Dichlorobenzene	280	0.9
1,2-Dichloroethane	0.35	0.001
1,4-Dichlorobenzene	3.2	0.1
Acetone	14000	0.8
Chlorobenzene	270	0.07
Ethylbenzene	230	0.7
Methylene chloride	8.9	0.001
o-Xylene	280	9
Tetrachloroethene	0.55	0.003
Toluene	520	0.6
Trichloroethene	0.043	0.003
Xylenes (total)	210	10

Sample Result Exceeds Residential Soil (0-6") MSSL
Sample Result Exceeds Soil Dilution Attenuation Factor (DAF)
Sample Result Exceeds Both Soil MSSL and DAF

Screening Levels for Groundwater Samples		
Analyte	Primary Drinking Water Standard (ug/L)	Region 6 TapWater MSSL (ug/L)
1,2-Dichlorobenzene	600	49
1,2-Dichloroethane	5	0.12
1,4-Dichlorobenzene	75	0.47
4-Methyl-2-pentanone (MIBK)	None	2000
Acetone	None	5500
Benzene	5	0.35
Chlorobenzene	100	91
Chloroethane	None	3.9
Chloroform	None	0.17
Methylene chloride	5	4.3
o-Xylene	None	1400
Styrene	100	1600
Toluene	1000	2300

Sample Result Exceeds the Primary Drinking Water Standard
Sample Result Exceeds the Tap Water MSSL
Sample Result Exceeds Both the Primary Drinking Water Standard and the Tap Water MSSL

- PROPOSED (Blue Diamond)
EXISTING (Green Circle)
Perched Well Location (Red Cross)
Upper Alluvial Well Location (Black Circle)
Middle Alluvial Well Location (Crossed Box)
Lower Alluvial Well Location (Red Circle)

GDPT-5+ DIRECT PUSH LOCATION
TW-1 TEMPORARY WELL LOCATION

SUSPECT WASTE BURIAL AREA
DPT-2 DPT-18 DPT-39 ADEQ EXPANDED PROTOCOL

DPT-10 (0-4') 3/27/2008
1,2-Dichloroethane 0.4 mg/kg
Tetrachloroethene 2.1 mg/kg
Trichloroethene 0.0066 J mg/kg

Concentration of Analytes Detected above Screening Levels

ND - VOCs Not Detected above Screening Levels

NA - Sample Not Collected

TBP - To be Plugged and Abandoned

NOTE:
ALL ALLUVIAL WELLS WILL BE INSTALLED USING ROTATIONAL DRILLING TECHNIQUES IN A SINGLE BOREHOLE.

ALL PROPOSED WELL & BORING LOCATIONS ARE APPROXIMATE, & MAY BE ADJUSTED BASED ON UTILITIES, FIELD ACCESS, & OTHER CONDITIONS.

BASEMAP MODIFIED FROM:
EnSafe, 1996-Phase III Fl. 2001 Groundwater Monitoring Report,
Drawings C2162GWS and C2162C7

VOCs in Soil and Groundwater and Proposed Perched and Alluvial Monitoring Well Locations
DPT Investigation March 2008

Cedar Chemical
Helena-West Helena, Arkansas

By: MLS Date: 5/27/08 Project No. 13636

Geomatrix Figure 136



Screening Levels for Soil Samples		
Analyte	Residential Soil (0-6" bgs) (mg/kg)	DAF (6" to Groundwater) (mg/kg)
1,2-Dichlorobenzene	280	0.9
1,4-Dichlorobenzene	3.2	0.1
2,4-Dinitrophenol	120	0.01
4-Chloroaniline	240	0.03
Dinoseb	61	NA
Hexachlorobenzene	0.3	0.1
Isophorone	510	0.03
Propanil	310	NA

Sample Result Exceeds Residential Soil (0-6") MSSL
Sample Result Exceeds Soil Dilution Attenuation Factor (DAF)
Sample Result Exceeds Both Soil MSSL and DAF

Screening Levels for Groundwater Samples		
Analyte	Primary Drinking Water Standard (ug/L)	Region 6 TapWater MSSL (ug/L)
1,2-Dichlorobenzene	600	49
Propanil	None	180
Dinoseb	7	37
bis(2-Chloroethyl) ether	None	0.0098
4-Chloroaniline	None	150
1,3-Dichlorobenzene	None	15

Sample Result Exceeds the Primary Drinking Water Standard
Sample Result Exceeds the Tap Water MSSL
Sample Result Exceeds Both the Primary Drinking Water Standard and the Tap Water MSSL

EXPLANATION

- PROPOSED ↓
- EXISTING ↓
- Perched Well Location (Red circle)
- Upper Alluvial Well Location (Black circle)
- Middle Alluvial Well Location (Red square)
- Lower Alluvial Well Location (Red circle with cross)

GOPT-5 DIRECT PUSH LOCATION
TW-1 TEMPORARY WELL LOCATION
SUSPECT WASTE BURIAL AREA IDENTIFIED BY ADEQ
DPT-2 DPT-18 ADEQ EXPANDED PROTOCOL
DPT-39

Sample ID with Depth | Concentration of Analytes Detected above Screening Levels

DPT-10 (0-4')	3/27/2008	ND - VOCs Not Detected above Screening Levels
1,2-Dichloroethane	0.4 mg/kg	NA - Sample Not Collected
Tetrachloroethene	2.1 mg/kg	
Trichloroethene	0.0066 J mg/kg	

ND - VOCs Not Detected above Screening Levels
NA - Sample Not Collected
TBP - To be Plugged and Abandoned

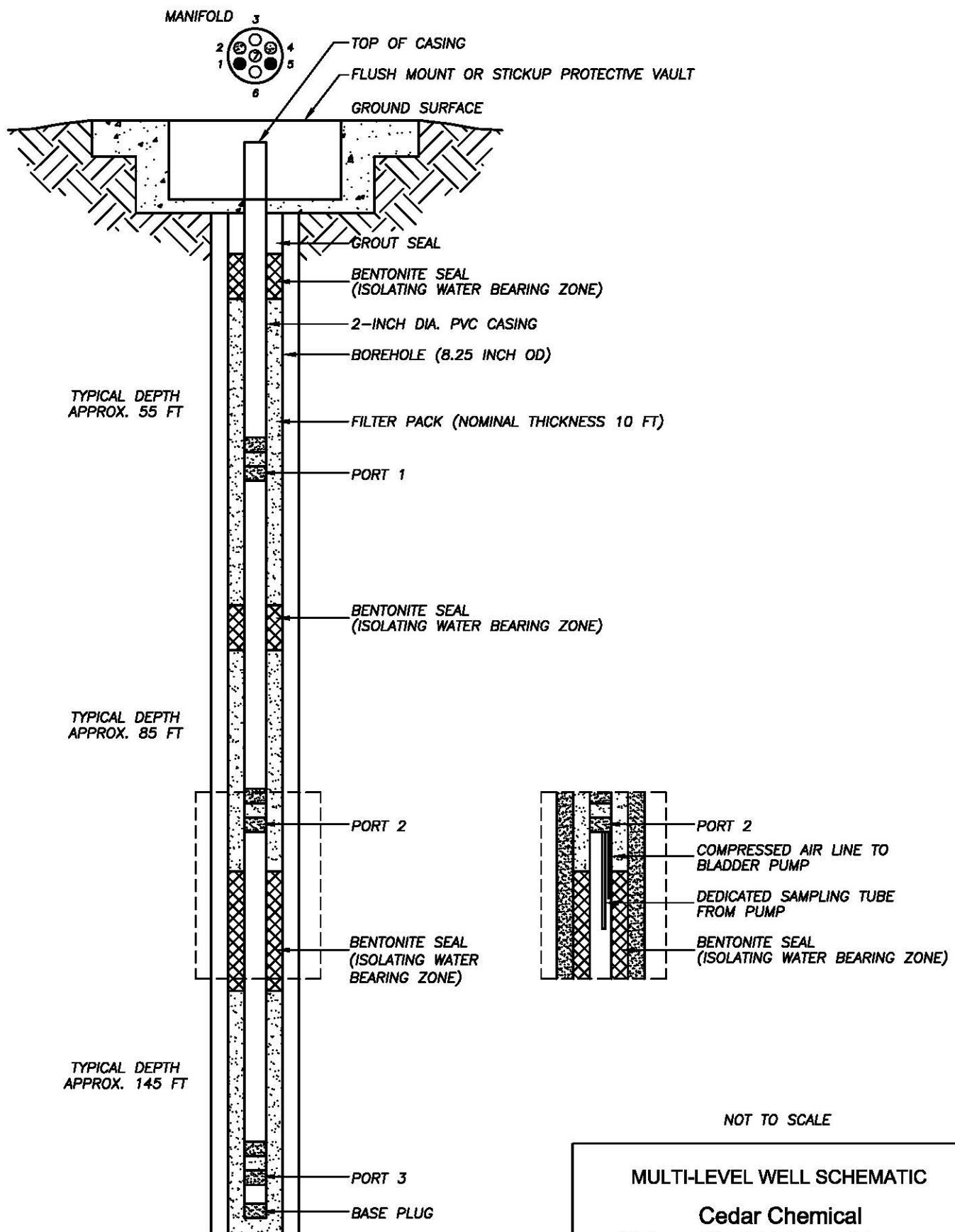
NOTE:
ALL ALLUVIAL WELLS WILL BE INSTALLED USING ROTATIONAL DRILLING TECHNIQUES IN A SINGLE BOREHOLE.

ALL PROPOSED WELL & BORING LOCATIONS ARE APPROXIMATE, & MAY BE ADJUSTED BASED ON UTILITIES, FIELD ACCESS, & OTHER CONDITIONS.

BASEMAP MODIFIED FROM:
EnSafe, 1996-Phase III F1, 2001 Groundwater Monitoring Report,
Drawings C216GWS and C216GCV

SVOCs in Soil and Groundwater and Proposed Perched and Alluvial Monitoring Well Locations
DPT Investigation March 2008
Cedar Chemical
Helena-West Helena, Arkansas

By: MLS Date: 5/27/08 Project No. 13636
Geomatrix Figure 3



NOTE:
SCHEMATIC SHOWS 3-PORT COMPLETION.
SOME WELLS MAY HAVE 2-PORT COMPLETION.

MULTI-LEVEL WELL SCHEMATIC

Cedar Chemical
Helena-West Helena, Arkansas

By: HCS	Date: 4/30/08	Project No. 13636
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Geomatrix

Figure 4